## FISHER | TAUBENFELD LLP

225 Broadway, Suite 1700 New York, New York 10007 Main 212.571.0700 Fax 212.505.2001 www.fishertaubenfeld.com

Writer's direct dial: (212) 384-0258

Writer's email: michael@fishertaubenfeld.com

November 29, 2023

## **VIA ECF**

Hon. Nina R. Morrison United States District Judge **United States District Court** Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: Paccha v. APS Electric, Inc. et al Case No.: 23-cv-2075 (NRM)(MMH)

Dear Judge Morrison:

This firm represents Plaintiff in the above-captioned matter. We write to request an extension to serve Plaintiff's opposition, from November 30, 2023 until December 7, 2023, and Defendants' deadline to reply from December 5, 2023 to December 12, 2023. Defendants consent to the request. Plaintiff makes this request due to a key member of Plaintiff's counsel's staff experiencing a close death in the family, necessitating unexpected bereavement leave, followed closely by the Thanksgiving holiday. Plaintiff therefore needs additional time to complete his opposition. We therefore respectfully request the additional time.

We thank the Court for its consideration of this submission.

Respectfully submitted,
/ <sub>S</sub> /
Michael Taubenfeld